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*3/11/02*

March 8, 2002

**Attn: Rules Processing Team (RPT)**  
**Department of the Interior, Minerals Management Service**  
**MS 4024**  
**381 Elden Street**  
**Herndon, Virginia 20170-4817**

**Re: Notice of Proposed Rulemaking**  
**Procedures for Dealing with Sustained Casing Pressure**

Gentlemen:

Devon Energy Corporation appreciates the opportunity to comment on the proposed rulemaking. We support the comments on the proposed rulemaking submitted by the Offshore Operators Committee (OOC). Further, we believe that the three-prong approach as outlined in the OOC comments is a more effective method for reducing risk and improving safety in a cost effective manner than a continued prescriptive regulatory approach to sustained casing pressure.

We appreciate your careful consideration of all of the comments concerning this rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read "James Pappas", written over a horizontal line.

James Pappas  
Deep Water Project Coordinator  
Gulf Division